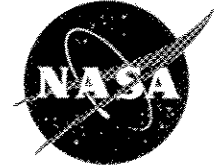


National Aeronautics and Space Administration  
Headquarters  
Washington, DC 20546-0001



October 3, 2011

Reply to Attn of:

General Law Practice Group

TO: Distribution

FROM: Alternate Designated Agency Ethics Official

SUBJECT: Determination Regarding Attendance by NASA Employees at the United Launch Alliance's (ULA) Reception in Englewood, Colorado on October 9, 2011

On October 9, 2011, the United Launch Alliance (ULA) will sponsor an evening reception at Inverness Hotel & Conference Center. The event is a stand-alone event that will take place one day prior to the 2011 ULA's Supplier Conference (October 10-11, 2011).

The dinner will be attended by approximately 250 people, including NASA personnel, DoD and other government agencies, and industry representatives. Many of the attendees will be attending the conference. The estimated cost of the reception, which includes all food and beverages, is \$25.00 per person. I find that this reception meets the requirements of a "widely-attended gathering" as defined in 5 C.F.R. § 2635.204(g).

I further determine that there is an Agency interest in having NASA personnel attend the event because it will further Agency programs or operations. Additionally, attendance at this event will assist the supplier base to align in its objectives to meet customer acquisition needs. Accordingly, NASA employees whose duties do not substantially affect the sponsor, or a majority or all of their members, may accept an invitation for free attendance to the reception.

However, NASA employees whose duties may substantially affect the event sponsors, such as by way of procurement duties, or who are in non-career positions for which the President's Executive Order of January 21, 2009 requires signing the ethics pledge, should seek an individual determination pursuant to 5 C.F.R. § 2635.204(g)(3)(i) regarding participation in this event from their local ethics counselor.

A handwritten signature in black ink, appearing to read "Adam F. Greenstone", written over a horizontal line.

Adam F. Greenstone